1 2	Sharon Butler, as Guardian ad Litem for Brooke Alexis Love, a minor, In Propria Persona %5990 Sepulveda Boulevard, Suite #330		
3	Van Nuys, California 91411-2523 (818)779-1720 phone		
4	(818)779-1730 Fax		
5	Creditor Brooke Alexis Love, a minor, by and through her Guardian ad Litem, Sharon Butler		
6	Propria Persona		
7			
8	UNITED STATES BA	ANKRUPTCY COURT	
9	SOUTHERN DISTRICT OF NEW YORK		
10		ICI CI IVIV I CICI	
11		Chapter 11	
12	In re:	Case No.: 09-50026 (REG) (Jointly Administered)	
13	MOTORS LIQUIDATION COMPANY f/k/a GENERAL MOTORS	NOTICE OF MOTION BY CREDITOR,	
14	CORPORATION, et al.,	BROOKE ALEXIS LOVE, A MINOR, BY AND THROUGH HER GUARDIAN	
15	Debtors.	AD LITEM, SHARON BUTLER, FOR RELIEF FROM AUTOMATIC STAY	
16		TO ALLOW THE CONTINUED PURSUIT OF AN INSURED	
17 18		PERSONAL INJURY ACTION AND REQUEST FOR RULE 9011	
19		SANCTIONS, [CERTIFICATE OF CONFERENCE FILED	
20		CONCURRENTLY HEREWITH]	
21	THROUGH HER GUARDIAN AD LIT	COOKE ALEXIS LOVE, A MINOR, BY AND EM, SHARON BUTLER, FOR RELIEF	
22	FROM AUTOMATIC STAY TO ALLOW THE CONTINUED PURSUIT OF AN INSURED PERSONAL INJURY ACTION AND REQUEST FOR RULE 9011 SANCTIONS		
23	PLEASE TAKE NOTICE that upon the Motion of Creditor, Brooke Alexis Love, a		
24	minor, by and through her Guardian ad Litem, Sharon Butler, ("Movant") for relief from		
25	the automatic stay pursuant to 11 U.S.C. Sec. 362(d)(1), a hearing will be held before the		
26	Honorable Robert E. Gerber, United States Bankruptcy Court, Southern District of New		
27	York, One Bowling Green, Courtroom 621, New York, New York 10004, on November 12,		
28	2009 2 p.m. EST ("Hearing Date") or as soon the	ereafter as counsel can be heard, upon Movant's	

request for entry of an Order granting the following:

- (i) relief from the automatic stay concerning Motors Liquidation Company f/k/s General Motors Corporation ("Debtors") and Debtors' bankruptcy estates, as it relates to Movant;
- (ii) permission to proceed under applicable non-bankruptcy law to prosecute Movant's personal injury claim against Debtors to its conclusion, but to enforce any award rendered only against Debtors' available insurance proceeds;
- (iii) that the Order be binding and effective despite any conversion in this bankruptcy case to a case under any other Chapter of Title 11 of the United States Code.
- (iv) for an Order, pursuant to Rule 9011(c)(1)(b) of sanctions against Debtor and Debtors' counsel.

PLEASE TAKE FURTHER NOTICE, that responses or objections, if any, to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and Local Rules of Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically, and in accordance with General Order M-242 by registered users of the Bankruptcy Court's case filing system, with a hard copy delivered directly to Chambers, and shall be served upon: (a) Sharon Butler, Guardian ad Litem for Brooke Alexis Love, a minor, In Propria Persona for Movant, at 5990 Sepulveda Boulevard, Suite #330, Van Nuys, California 91411-2523, and the Office of the United States Trustee, 33 Whitehall Street, 21st Floor, New York, New York 10004, so as to be actually received no later than three (3) days prior to the Hearing Date.

PLEASE TAKE FURTHER NOTICE, that unless objections are timely filed and received by the Court, the Court may grant the relief requested herein.

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned from time to time without further notice other than the announcement of such adjournment in open court or by posting of such adjourned date on the Court's calendar on the aforementioned date.

DATED: October 23, 2009

Sharon Butler, Guardian ad Litem for Brooke Alexis Love, a minor In Propria Persona

PROOF OF SERVICE

STATE OF CALIFORNIA)	
COUNTY OF LOS ANGELES)	

I am employed in Los Angeles County. My business address is 5990 Sepulveda Boulevard, Suite #330, Van Nuys, California 91411-2523. I am over the age of 18 years and am not a party to this cause.

On October 23, 2009, I served the following documents:

NOTICE OF MOTION BY CREDITOR, BROOKE ALEXIS LOVE, A MINOR, BY AND THROUGH HER GUARDIAN AD LITEM, SHARON BUTLER, FOR RELIEF FROM AUTOMATIC STAY TO ALLOW THE CONTINUED PURSUIT OF AN INSURED PERSONAL INJURY ACTION AND REQUEST FOR RULE 9011 SANCTIONS, [CERTIFICATE OF CONFERENCE FILED CONCURRENTLY HEREWITH]

on:

Brianna N.Benfield Esq. Joseph H. Smolinsky, Esq. Weil, Gotshal & Manges, LLP 767 Fifth Avenue New York, New York 10153

Monica J. Frascona, Esq. Dykema Gossett LLP 333 South Grand Avenue, Suite 2100 Los Angeles, California 90071

[X]	BY MAIL- I placed such envelope/s for collection and mailing on this date following ordinary business practices at Van Nuys, California. The envelope was mailed with postage thereon fully prepaid.
[]	BY PERSONAL SERVICE-I delivered such envelope by hand to said party at,at m. o'clock.
[]	BY OVERNITE EXPRESS MAIL-I placed such envelope/s for collection and Overnite Express mail on this date following ordinary business practices directed to the addresses above.
	BY FACSIMILE TRANSMISSION- I caused to be served by facsimile transmission at the number(s) listed above:
	STATE I declare under penalty of perjury that the foregoing is true and correct.
[X]	FEDERAL: I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.
	Executed on October 23, 2009, at Van Nuys, California Chris Meyer